

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
NORTHERN DIVISION**

DANIEL BRYAN KELLY,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO.: 2:05CV1150-M
)	
RICKY OWENS, ET AL)	
)	
Defendants.)	

MOTION FOR EXTENSION FOR FILING ANSWER

COME NOW, the Defendants, Al Bradley, Terry Wilson, and Wendy Roberson, in the above-styled cause, and requests this Honorable Court for an extension of time in which to file a response to the Plaintiff's Complaint. As grounds for said motion, the undersigned shows unto this Honorable Court as follows:

1. The undersigned counsel was retained to represent Defendants Bradley, Wilson and Roberson and received the Plaintiff's Complaint on or about December 29, 2005.
2. The attorney for Defendants Bradley, Wilson and Roberson has not had any communication with them to discuss the allegations contained in the Plaintiff's Complaint.
3. A twenty-one (21) day extension of time in which to respond to the Plaintiff's Complaint will in no way prejudice the Plaintiff.
4. Plaintiff's counsel has no objection to a continuance being granted.

WHEREFORE, ABOVE PREMISES CONSIDERED, Defendants Bradley, Wilson and Roberson respectfully request an extension of twenty-one (21) days up to and including January 25, 2006, in which to respond to the Plaintiff's Complaint.

Respectfully submitted this 4th day of January.

/s/ Kristi A. Dowdy
KRISTI A. DOWDY
ALA. BAR NO.: ASB-4760-W86K
ATTORNEY FOR AL BRADLEY,
TERRY WILSON & WENDY
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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the above and foregoing pleading upon all counsel of record listed below:

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by e-mail transmittal/hand-delivery through the e-filing system of the United States District Court, Middle District of Alabama and by placing a copy of same in the U. S. Mail, postage pre-paid and properly addressed, on this the 4th day of January, 2006.

/s/ Kristi A. Dowdy
KRISTI A. DOWDY